

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of)	WT Docket No. 10-4
the Commission's Rules to Improve Wireless)	
Coverage Through the Use of Signal Boosters)	

**COMMENTS OF
THE AD HOC TELECOMMUNICATIONS USERS COMMITTEE**

The Ad Hoc Telecommunications Users Committee ("Ad Hoc") submits these comments in response to the Commission's Public Notice¹ in the aforementioned proceeding.

INTRODUCTION

Ad Hoc is a longstanding organization of corporate enterprise customers that individually and collectively purchase large quantities of wireline and wireless telecommunications and information services. Its membership includes companies from a wide variety of industries including manufacturing, financial services, shipping and logistics, and transportation. Ad Hoc's membership does not include any telecommunications carriers or manufacturers of telecommunications equipment.

Seamless and ubiquitous wireless connectivity is an important component of

¹ *Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters*, WT-104, Public Notice, DA 17-220 (rel. Mar. 2, 2017).

nearly every enterprise network operating in today's increasingly competitive and global economy. Wireless communications now support many mission-critical applications of Ad Hoc member companies' worldwide businesses. Wireless signal boosters have, for many businesses, become a key building block in spreading wireless connectivity across a wide variety of facilities.

For the reasons set forth below, Ad Hoc supports Wilson Electronics' proposed revision² to the Commission's wireless signal booster rules to eliminate the so-called "personal use" restriction for all variations of consumer signal boosters.

I. ELIIMINATION OF THE "PERSONAL USE" RESTRICTION WILL FACILITATE REASONABLE, NON-INTERFERING DEPLOYMENT OF SIGNAL BOOSTERS

When the Commission adopted the wireless signal booster rules in 2013, it identified two specific goals: (1) enhancing wireless coverage for consumers by broadening the availability of signal boosters; and (2) ensuring that boosters do not adversely affect wireless networks.³ To further those goals, it adopted a sensible and straightforward regulatory structure that generally allowed use of so-called consumer signal boosters provided that such boosters meet certain minimum technical standards ensuring non-interference with wireless licensees' networks.

Following adoption of the signal booster rules, Ad Hoc has supported common sense refinements and clarifications to the rules that would promote the Commission's twin objectives and would clarify appropriate deployment and use of signal boosters for

² Wilson Electronics, LLC, Petition for Further Rulemaking, WT Docket No. 10-4 (Dec. 21, 2016) ("Petition of Wilson Electronics").

³ *Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters*, WT Docket No. 10-4, Report and Order, 28 FCC Rcd 1663 (2013) ("Signal Booster R&O"), at ¶ 1.

end users. For example, in 2013, Ad Hoc supported the Enterprise Wireless Alliance's proposed refinement of certain registration requirements.⁴ Of particular relevance to our support for the Petition of Wilson Electronics currently before the Commission, we noted back then that, while businesses frequently deploy industrial signal boosters in larger facilities, the use of "off the shelf" consumer signal boosters to improve wireless communications in small offices/locations provides an important alternative where installation of an Industrial Signal Booster is operationally or financially impractical.⁵

Elimination of the personal use restriction applicable to consumer signal boosters will further the Commission's stated goals when it first adopted the signal booster rules. The personal use restriction contained in 47 C.F.R. § 20.21(a) imposes an ambiguous and unnecessary limitation on the deployment and use of consumer boosters. The Commission has never clearly delineated the intent or scope of this restriction which creates confusion in the enterprise market as to the permissibility of using consumer signals in business settings. This is deeply problematic because, as Ad Hoc has previously stated to the Commission, consumer signal boosters are often the best choice for business end users for both technical and financial reasons. Consumer signal boosters can provide the most appropriately scaled scope of booster coverage required in a specific enterprise facility or location at a lower cost than an industrial signal booster which may provide unnecessarily powerful or broad boosting capabilities and require overly complicated installation at a particular location at too high a cost to

⁴ Comments of the Ad Hoc Telecommunications Users Committee in support of the Enterprise Wireless Alliance's Petition for Clarification and/or Reconsideration, WT Docket No. 10-4 (filed June 21, 2013) (seeking Commission clarification or modification to the deadlines and information required to make accurate and complete signal booster registrations)

⁵ *Id.* at 2.

be practical for deployment.

Surely it was not the Commission's intent to eliminate a technically and financially appealing choice for enterprise customers with no beneficial protection of the Commission's countervailing interest in preventing interference.⁶ Therefore, Ad Hoc supports Wilson Electronics' proposal and joins in urging the Commission to eliminate the unnecessary and confusing "personal use" restriction on consumer signal boosters.

II. THE PERSONAL USE RESTRICTION IS NOT NECESSARY TO PREVENT INTERFERENCE WITH WIRELESS LICENSEE NETWORKS

To the extent the Commission adopted the personal use restriction to further its goal of non-interference with licensee networks from signal booster use, we agree with Wilson Electronics that the restriction is unnecessary to prevent such interference.⁷ The Commission wisely adopted a reasonable and workable framework for deployment and use of consumer signal boosters that establishes a default technical standard centered around compliance with the National Protection Standard ("NPS") and a registration process that ensures any interference issues can be quickly resolved by wireless licensees. Any use of a consumer signal booster causing interference—whether "personal" or otherwise—would be adequately addressed by the framework already adopted by the Commission which utilizes the NPS, requires licensee consent of signal booster use, and establishes a signal booster registration process.

⁶ See Section II, *infra*.

⁷ Petition of Wilson Electronics at 16-18.

CONCLUSION

Elimination of the “personal use” restriction for consumer signal boosters will facilitate greater end-user choice of the type of signal booster that best serves the end user’s particular technical and financial needs. By allowing end users access to a more cost-effective and technical appropriate signal booster option, the Commission will enable greater deployment of non-interfering signal boosters and, in turn, greater wireless connectivity.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew Brown", with a long, sweeping horizontal line extending to the right.

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